23cv01300 MEMO ENDORSED

10/6/2024 Plaintiff's request for a protective order is denied without prejudice.

Ali Moore SO ORDERED. Edgardo Ramos, U.S.D.J.

Dated: November 12, 2024 New York, New York

MOTION FOR A PROTECTIVE ORDER TO ENSURE CONFIDENTIALITY OF PROCEEDINGS AND TRANSCRIPTS

COMES NOW the Plaintiff, [ali Moorer], and respectfully moves this Honorable Court to enter a Protective Order to ensure the confidentiality of any upcoming conference proceedings, including any audio recordings, video recordings, or transcripts produced during these proceedings. In support of this motion, Plaintiff states as follows:

- 1. **Purpose of the Motion**: Plaintiff seeks an order protecting the confidentiality of the conference proceedings with the Court and defendants to prevent unauthorized disclosure of sensitive information that may be discussed.
- 2. **Basis for Confidentiality**: Plaintiff submits that the matters to be discussed during the conference involve sensitive information that, if made public, could compromise the privacy and interests of the parties involved. Plaintiff has a legitimate interest in maintaining confidentiality to protect [specify sensitive information, such as personal details, proprietary data, or privacy concerns].
- 3. Scope of Protective Order Requested:
 - That any recordings, transcripts, or other documentation of the conference proceedings remain sealed
 - That no part of the conference proceedings be disclosed, distributed, or otherwise made available to any individuals or entities not directly involved in this case without the express permission of the Court.
- 4. **Precedent and Justification**: It is well-established that courts have the authority to issue protective orders to prevent unnecessary disclosure of sensitive information. Such an order would prevent the public release of confidential information and uphold the privacy rights of all parties involved.
- 5. **Good Faith**: This motion is filed in good faith and is not intended to hinder or delay the proceedings but rather to ensure the protection of sensitive information discussed in the conference.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant this Motion for a Protective Order, thereby ensuring that the conference proceedings, as well as any recordings, transcripts, or documentation, remain confidential for the meeting today 10/6/2024